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**From:** Fritz, Jason [Fritz.Jason@epa.gov]  
**Sent:** 10/21/2013 5:23:17 PM  
**To:** Subramaniam, Ravi [Subramaniam.Ravi@epa.gov]  
**Subject:** RE: CH2O: site & time variability in cell replication, uncertainties in MOA inferences from modeling  
**Attachments:** RS Oct 2013\_notes for appendix.docx

Thanks for sending me that appendix Ravi. I read through C.1.5.x and have a few general thoughts/comments (in the attached "notes", which follow my copy-and-paste of your instructions).

**Ex. 5 Deliberative Process (DP)**

jf

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**From:** Subramaniam, Ravi  
**Sent:** Friday, October 18, 2013 6:23 PM  
**To:** Fritz, Jason  
**Subject:** CH2O: site & time variability in cell replication, uncertainties in MOA inferences from modeling

Jason:

I think you might find the conclusions in the Appendix from the analysis of cell replication data for formaldehyde from Monticello et al useful. Because these data were so extensive and required considerable analyses, they have been presented with the dose-response modeling. There is a lot of material, so you may want to focus on the following:

Table C-3 of section C.1.5.1 page C-327 tabulates the various issues in the modeling and where one would find them elaborated. Specifically you want to look at issues related to the analysis of the labeling data in this Table. The locations are hyperlinked.

The site and time variability in cell replication is covered in C.1.5.4. Particularly the text surrounding Figures C-17, C-21 etc & C-35, page 336, 343-349 would be useful.

Finally C.1.5.7 (page LT-7) may also be of interest (although peripherally) in the context of inferences that have been made in the CIIT modeling that pertain to MOA.

If perchance you happen to wander off into C.1.6 note that this section is not complete yet.

If you have comments and suggestions as you read, it would be very useful.

Ravi.